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Attorneys for Defendant
ALEXANDRU ION

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No.: 2:12-cr-00004-APG-EJY
)	
v.)	
)	
ALEXANDRU ION,)	
)	
Defendant.)	
_____)	

STIPULATION AND ORDER TO CONTINUE
CONSOLIDATED CHANGE OF PLEA AND SENTENCING HEARING
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Defendant ALEXANDRU ION, by and through his attorney (Richard J. Pocker, Esq. of the law firm of Boies Schiller Flexner LLP), and the Plaintiff UNITED STATES OF AMERICA (hereinafter, “the Government”), by and through its attorney Chad McHenry, Esq., Trial Attorney with the U.S. Department of Justice Organized Crime and Gang Section of the Criminal Division, that the consolidated Change of Plea and Sentencing Hearing in the present case be continued to August 12, 2020 or a date no more than twenty-one (21) days from the date of this stipulation.

This Stipulation is entered for the following reasons:

1 1. The present case has been set for a Change of Plea Hearing on July 29, 2020.
2 On July 24, 2020, the parties filed a Joint Motion to Waive the Presentence Investigation,
3 seeking to consolidate the entry of Defendant ION's plea with his sentencing. On July 24,
4 2020, the Court granted the parties' Joint Motion. Consequently, at present, Defendant will
5 change his plea and be sentenced just one day after the date of this Stipulation.

6 2. The parties, with the Court's approval, have agreed to proceed to sentencing
7 without the preparation of a presentence investigation report. Nevertheless, Defendant ION
8 and his counsel require a very brief fourteen (14) day continuance in Order to prepare
9 Defendant ION's sentencing submission and statement, and to execute appropriate waivers of
10 his in court presence. The parties have been advised that the Court may be able to schedule the
11 consolidated Hearing for August 12, 2020, and the parties request that it do so, or in the
12 alternative, set the Hearing within 21 days of this Stipulation.

13 3. Defendant ION is presently detained pending trial, and does not object to this
14 short postponement given the importance of the imposition of sentence to his future. In fact,
15 granting the present Stipulation will enable him to make sure his sentencing statement is
16 adequately crafted, and that the Court is effectively advised of pertinent facts and
17 considerations.

18 4. The additional time requested herein is not sought for purposes of delay, but
19 merely to allow Defendant ION and his counsel sufficient time to prepare for the consolidated
20 Hearing, especially in light of the restrictions on meetings and communications posed by the
21 COVID-19 public health crisis.

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1 5. This is the first request to continue the consolidated Change of Plea and
2 Sentencing Hearing in the present case, other than rescheduling initiated by the Court.

3 DATED this 28th day of July, 2020.

4 BOIES SCHILLER FLEXNER LLP

NICHOLAS TRUTANICH
United States Attorney


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6 By: /s/ Richard J. Pocker
7 RICHARD J. POCKER, ESQ.
8 Counsel for Alexandru Ion

By: /s/ Chad McHenry
CHAD McHENRY, ESQ.
Trial Attorney with the U.S.
Department of Justice Organized
Crime and Gang Section of the
Criminal Division

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13 **ORDER**

14 Based upon the pending Stipulation of counsel, and good cause appearing
15 IT IS HEREBY ORDERED that the consolidated Change of Plea and Sentencing Hearing
16 in the present case be continued to August 12, 2020 at 1:00 p.m. in courtroom 6C.

17 DATED this 28th day of July, 2020.

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20 UNITED STATES DISTRICT JUDGE